

AO 91 (Rev. 11/11) Criminal Complaint

**UNITED STATES DISTRICT COURT**  
for the  
District of New Mexico

**FILED**  
United States District Court  
Albuquerque, New Mexico  
Mitchell R. Elfers  
Clerk of Court

United States of America  
v.  
Reynaldo Antonio VARGAS

Case No. **23 MJ 964**

\_\_\_\_\_  
*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 12, 2023 in the county of Bernalillo in the  
\_\_\_\_\_  
District of New Mexico, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841 (a)(1) and (b)(1)(B)	Distribution of a mixture and substance containing 400 grams or more of fentanyl
21 U.S.C. § 841 (a)(1) and (b)(1)(B)	Distribution of 50 grams and more of methamphetamine

This criminal complaint is based on these facts:

Please see the attached affidavit of DEA Special Agent Kyle Coffey, which is incorporated by reference and has been reviewed and approved by AUSA Jaymie Roybal.

☒ Continued on the attached sheet.

*SA Kyle Coffey*

\_\_\_\_\_  
*Complainant's signature*

Kyle Coffey, DEA Special Agent

\_\_\_\_\_  
*Printed name and title*

Telephonically sworn and electronically signed.

Date: 06/02/2023

*John F. Robbenhaar*

\_\_\_\_\_  
*Judge's signature*

City and state: Albuquerque, New Mexico

John F. Robbenhaar, U.S. Magistrate Judge

\_\_\_\_\_  
*Printed name and title*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

IN THE MATTER OF THE ARREST OF:

REYNALDO VARGAS (YOB 1977)

Case No. \_\_\_\_\_

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent (“SA”) with the United States Drug Enforcement Administration (“DEA”) and have been since May 2020. I am assigned to the DEA’s Albuquerque District Office. As a SA for the DEA, I am an investigative law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7) and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516. As a SA with DEA, I retain the powers of enforcement as set forth in 21 U.S.C. § 878. Prior to my employment with the DEA, I was employed as a police officer with the Virginia Beach Police Department for approximately four years. Over the course of my career, I have accumulated the following training and experience:

- a. I graduated from the DEA Academy in Quantico, Virginia, where I received approximately 14 weeks of specialized drug-related training. The training included controlled substance identification, drug-related investigative techniques, interview and interrogation training, preparation of search warrants, tactical applications of drug enforcement, and surveillance and electronic monitoring techniques.
- b. As a police officer and a DEA SA, I have participated in investigations of

individuals and organizations trafficking heroin, cocaine, cocaine base (“crack”), marijuana, methamphetamine, fentanyl, and other controlled substances as defined in 21 U.S.C. § 801. My experience as a SA includes, but is not limited to, conducting surveillance; interviewing witnesses; participating in arrests, searches, and seizures; drafting affidavits for search warrants and criminal complaints; and working with informants. I have participated in the investigation of several drug trafficking conspiracies. As a result, I am familiar with matters including, but not limited to, the means and methods used by persons and drug trafficking organizations (DTO) to purchase, transport, store, and distribute illegal drugs and to hide profits generated from those transactions.

2. This case is being investigated by the DEA. I have personally participated in the investigation described below. I make this affidavit based on my participation in the investigation, as well as my review of reports and information made available to me by other agents, task force officers (“TFOs”), and other law enforcement authorities. This Affidavit is intended only to show that there is sufficient probable cause for the requested criminal complaint and does not set forth all of my knowledge or the surrounding facts pertaining to this matter.

#### **SUMMARY OF PROBABLE CAUSE**

3. This Affidavit is made in support of the issuance of a criminal complaint charging Reynaldo Antonio Vargas ( “VARGAS”) with the following violations:

- a. 21 U.S.C. § 841 (a)(1) and (b)(1)(B): distribution of a mixture and substance containing 400 grams or more of fentanyl; and

b. 21 U.S.C. § 841 (a)(1) and (b)(1)(A): distribution of 50 grams and more of methamphetamine; and

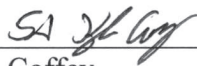
4. On May 12, 2023, VARGAS met with an undercover agent (“UC”) for the purpose of conducting a drug deal. VARGAS sold quantities of suspected fentanyl and suspected methamphetamine to the UC for a total of approximately \$5,200.00.

5. The purchased narcotics were sent to a DEA laboratory for analysis. Agents field tested and weighed the suspected fentanyl, which indicated presumptive positive for fentanyl, weighing approximately 503.8 gross grams. The DEA laboratory returned analysis result for methamphetamine, weighing approximately 430.7 grams.

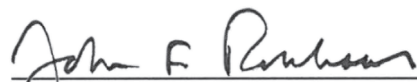
6. Based on my training and experience, I know the amounts of narcotics sold by VARGAS to a UC are consistent with drug trafficking and not personal use quantities.

7. I declare under the penalty of perjury that the facts contained herein are true and correct to the best of my knowledge.

8. Assistant United States Attorney Jaymie Roybal reviewed and approved this Affidavit.

  
\_\_\_\_\_  
Kyle Coffey  
Special Agent  
Drug Enforcement Administration

Telephonically sworn to me and electronically signed  
this 2nd day of June, 2023.

A handwritten signature in black ink, appearing to read "John F. Robbenhaar", is written over a horizontal line.

THE HONORABLE JOHN F. ROBBENHAAR  
United States Magistrate Judge